proper understanding of the invention, should be illustrated in the drawing in the form of a graphical drawing symbol or a labeled representation."

That is precisely what Applicants have done here: illustrated the conventional feature of a capacitor dielectric layers with the labeled representations: 26, 27, 28, and 28.

Therefore, Applicants respectfully submit that the Drawings are fully in compliance with 37 C.F.R. § 1.83(a). Accordingly, Applicants respectfully request that the Examiner withdraw the objection to the Drawings.

35 U.S.C. § 103

The Office Action dated 18 October 2002 rejected claims 1-12 over Ng, stating that:

> "Ng et al. teach a first level line and a second level line of each of the at least four line pairs is connected by at least plurality of vias, as claimed"

However, Applicants respectfully submit that is not what was claimed. Prior to this amendment, claim 1 recited:

> "the first level line and the second level line of each of the at least four line pairs is connected by at least a **respective** plurality of vias"

Applicants have amended the claim 1 to make it unmistakably clear that the plurality of vias is arranged in a plurality of groups, **each group corresponding uniquely to one of the coplanar line pairs and including at least two vias** connecting the first level line and the second level line of the corresponding line pair. That is, the first and second level lines of each line pair are connected by a unique, corresponding, plurality of vias.

No such feature is disclosed or suggested by Ng. In Ng Fig. 8, for example, the plurality of vias 230 does not include any group (of at least two vias) that corresponds uniquely to any of the coplanar line pairs. Indeed, as can be more easily seen in FIG. 11, the device disclosed by Ng, with the vias exclusively provided at the interconnecting electrodes 210, 220, etc. and never at the first level lines 211 or 221, lacks a sufficient number of vias to ever provide the benefits of the capacitor of claim 1.

As explained in the Amendment filed on 9 November 2001, this is not a mere design choice, as Applicants have discovered that such a feature improves the capacitor effect of the structure.

Accordingly, for at least these reasons, Applicants respectfully submit that claim 1 is patentable over Ng. Claims 2-12, dependent from claim 1, are deemed patentable for at least the same reasons.

New Claims 13-20

Applicants respectfully submit that each of the new claims 13-20 defines